

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

R. CATHY REARDON
On behalf of herself and all
similarly situated individuals,

Plaintiffs,

v.
CLOSETMAID CORPORATION

Defendant.

NO. 2:08cv1730 MRH

Hon. Judge Mark R. Hornak

Class Action

PLAINTIFF'S PROPOSED JURY VERDICT FORM

Plaintiff, R. CATHY REARDON, by and through her undersigned attorneys, and in accordance with the Court's December 6, 2013 Order, files the within Proposed Verdict Slip.

We, the jury, being duly impaneled and sworn to try the above-entitled case, do find our verdict as follows:

A. DISCLOSURE CLASS

The Court has determined that defendants willfully violated the Fair Credit Reporting Act Disclosure requirements.

1. What is the amount of statutory damages per Disclosure class member that you award?

[SUCH STATUTORY DAMAGES PER CLASS MEMBER MUST BE NO LESS THAN \$100 AND NO MORE THAN \$1,000]

\$ _____

2. What is the amount of punitive damages per Disclosure class member you award?

\$ _____

B. PRE-ADVERSE ACTION CLASS

The Court has determined that defendants willfully violated the Fair Credit Reporting Act Pre-Adverse Action requirements.

1. What is the amount of statutory damages per Pre-Adverse Action class member that you award?

[SUCH STATUTORY DAMAGES PER CLASS MEMBER MUST BE NO LESS THAN \$100 AND NO MORE THAN \$1,000]

\$ _____

2. What is the amount of punitive damages per Pre-Adverse Action class member you award?

\$ _____

ALTERNATE

B. PRE-ADVERSE ACTION CLASS

The Court has determined that defendants willfully violated the Fair Credit Reporting Act Pre-Adverse Action requirements for each Pre-Adverse Action class member regarding who ClosetMaid used a consumer report in whole or in part in making an adverse employment action.

1. Did ClosetMaid use the consumer report of this Pre-Adverse Action class member in whole or in part in making an adverse employment action?

CLASS MEMBER NAMES Yes _____ No _____
1-50

2. If you selected "YES" for one or more Pre-Adverse Action class members, what is the amount of statutory damages per Pre-Adverse Action class member that you award?

[SUCH STATUTORY DAMAGES PER CLASS MEMBER MUST BE NO LESS THAN \$100 AND NO MORE THAN \$1,000]

\$ _____

3. What is the amount of punitive damages per Pre-Adverse Action class member you award?

\$ _____

Respectfully submitted,

By: /s/ James M. Pietz

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